CGB-CC-1155

Pastor Richard Forsythe Peoples Baptist Church 3523 Spotswood Trail Penn Laird, VA 22846 Received & Inspected NOV C 4 2011 FCC Mail Room

November 1, 2011

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

To Whom It May Concern:

On behalf of Peoples Baptist Church, I would like to formally petition the Commission for an exemption from the closed captioning rules due to economic burden. This petition is requested for our program "Light For Today" to be broadcast on our local ABC affiliate, WHSV (Harrisonburg, Virginia). Light For Today is a 28:30 long program featuring one song followed by a sermon.

The actual broadcast project itself has been an economic challenge for our church, which maintains a membership roll of approx. 220 people. In order to make the weekly broadcast a reality, all of our major broadcast gear (cameras, video switcher, monitors) has been donated by local television stations. All of our camera operators are 100% volunteer, and one of our parishioners will do all of our post-production editing at no charge.

We are being charged \$400 per week in airtime fees. This is the only expense incurred by the program, and it has been difficult to secure those funds. We have attempted to secure outside sponsorship, but (particularly in this economy) we have been largely unsuccessful. We currently have one weekly sponsor – a parishioner who also owns a local business. He will pay \$100 per week, which goes towards the airtime charge. After recognizing that we would not be able to fund the program with sponsorship, we informed the congregation that we would likely not be able to air the show. Following that announcement, a few members have made donations.

These donations – along with our sole sponsor – do not cover the full airtime expense. The remainder of the funds – for now – will come from our church budget. We consider this to be GOD's money, and as such we manage it very carefully. In the last year, we have made several difficult decisions including a reduction in staff size. If we deem that further cuts are necessary, the video program will likely be the next item eliminated.

We have investigated options for providing closed captions for our program. Our local broadcast station does not provide a captioning service. Nationally, the cheapest option we've found for a 28:30 program like ours is \$200 per week (Impact Media – Hesston,

PA). This charge would represent a 50% increase in weekly costs – an increase our budget cannot sustain.

While we recognize that it's not closed captioning, we do superimpose the full text and reference of any scripture mentioned during a sermon.

We believe Light For Today represents a powerful opportunity to spread GOD's Word throughout our viewing area – reaching those in rural areas who aren't near a church, as well as the disabled, elderly and other shut-ins who are physically incapable of attending a church service. It is our desire to provide this service to our community. However, if we are forced to comply with the current FCC captioning rules, we will likely be unable to do so.

Thank you for your consideration of this matter.

Sincerely,

Pastor Richard Forsythe

Given under my hand this 300 day

of November, 2011. My commission

expires 7/31/2014

JO ANN GARRISON NOTARY PUBLIC Commonwealth of Virginia

ID #167165